

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-20059-CR-ALTONAGA/REID(s)  
18 U.S.C. § 1001(a)(2)

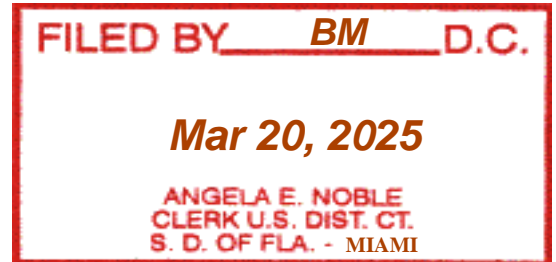
UNITED STATES OF AMERICA

vs.

CHENGZHE WANG,

Defendant.

/



**SUPERSEDING INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**Material False Statement to Government Agency**  
**(18 U.S.C. § 1001(a)(2))**

From on or about January 14, 2025, through on or about January 15, 2025, at the Miami International Airport, in Miami-Dade County, in the Southern District of Florida, in a manner within the jurisdiction of the United States Customs and Border Protection, an agency of the executive branch of the United States Government, the defendant,

**CHENGZHE WANG,**

did knowingly and willfully make a false, fictitious, and fraudulent statement and representation as to a material fact, in that, he falsely represented that his employer is a privately-owned company with no ties to the Chinese government; he was no longer a member of the Communist Youth League of China, which is part of the Chinese government; and that his 2023 trip from Seoul, South Korea, to Dallas, Texas, was for vacation and to visit a friend, when, in truth and in fact, as the defendant knew, his employer is owned by the Chinese government; he is still an active member of the Communist Youth League of China, which is part of the Chinese government; and that his 2023 trip from Seoul, South

Korea, to Dallas, Texas, was for the purpose of attending business meetings in Houston, Texas, in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL



FOREPERSON

A blue ink signature of Hayden P. O'Byrne, written over a horizontal line.

HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY

A blue ink signature of Ajay J. Alexander, written over a horizontal line.

AJAY J. ALEXANDER  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: 25-20059-CR-Altonaga/Reid (s)

v.

CHENGZHE WANG,

**CERTIFICATE OF TRIAL ATTORNEY**\_\_\_\_\_  
Defendant.**Court Division** (select one)
☒ Miami    ☐ Key West    ☐ FTP  
☐ FTL    ☐ WPB
**Superseding Case Information:**New Defendant(s) (Yes or No) NoNumber of New Defendants 0Total number of new counts 0

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) Yes  
List language and/or dialect: Mandarin
4. This case will take 2 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one) I <input checked="" type="checkbox"/> 0 to 5 days II <input type="checkbox"/> 6 to 10 days III <input type="checkbox"/> 11 to 20 days IV <input type="checkbox"/> 21 to 60 days V <input type="checkbox"/> 61 days and over	(Check only one) <input type="checkbox"/> Petty <input type="checkbox"/> Minor <input type="checkbox"/> Misdemeanor <input checked="" type="checkbox"/> Felony
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6. Has this case been previously filed in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Judge Jonathan Goodman Magistrate Case No. 25-MJ-02093
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of January 15, 2025
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: 

AJAY J. ALEXANDER

Assistant United States Attorney

SDFL Court ID No. A5502506

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

**Defendant's Name:** CHENGZHE WANG

**Case No:** 25-20059-CR-Altonaga/Reid(s)

Count 1

Material False Statement to Government Agency

Title 18, United States Code, Section 1001(a)(2)

**\* Max. Term of Imprisonment:** 5 years

**\* Mandatory Min. Term of Imprisonment (if applicable):** N/A

**\* Max. Supervised Release:** 1 years

**\* Max. Fine:** \$250,000

**\*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**